

## April Barker

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**From:** Kevin Vick <kvick@jassylvick.com>  
**Sent:** Wednesday, June 23, 2021 5:56 PM  
**To:** Walker, Leita; April Barker  
**Cc:** Kelley, Matthew E.; Jeffrey Payne; Friedman, James  
**Subject:** RE: Initial Disclosures  
**Attachments:** image005.wmz; Protective Order, Draft 06 22 21.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

April and Leita,

Attached is a proposed protective order. My colleague Jeff prepared this to conform as closely as possible to E.D. Wis. model protective order. He just made one cut in redline about providing confidential information to unnamed class members, since that's not applicable here. If the substance looks OK, we can finalize and add in signature blocks for various counsel and the Court. Please let me know your thoughts.

Thanks,

Kevin



**Kevin L. Vick**  
**Jassy Vick Carolan LLP | 310-870-7048 | [kvick@jassylvick.com](mailto:kvick@jassylvick.com)**  
**800 Wilshire Blvd., Suite 800 | Los Angeles, CA 90017**  
**[jassylvick.com](http://jassylvick.com)**

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**From:** Walker, Leita <[WalkerL@ballardspahr.com](mailto:WalkerL@ballardspahr.com)>  
**Sent:** Tuesday, June 15, 2021 11:18 AM  
**To:** April Barker <[abarker@sbe-law.com](mailto:abarker@sbe-law.com)>  
**Cc:** Kelley, Matthew E. <[KelleyM@ballardspahr.com](mailto:KelleyM@ballardspahr.com)>; Kevin Vick <[kvick@jassylvick.com](mailto:kvick@jassylvick.com)>  
**Subject:** RE: Initial Disclosures

Hi, April,

I believe Kevin is working on a protective order for the rest of us to review. I've copied him here.

EXHIBIT

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Leita

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**From:** April Barker <[abarker@sbe-law.com](mailto:abarker@sbe-law.com)>  
**Sent:** Tuesday, June 15, 2021 11:59 AM  
**To:** Walker, Leita (Minn) <[WalkerL@ballardspahr.com](mailto:WalkerL@ballardspahr.com)>  
**Cc:** Kelley, Matthew E. (DC) <[KelleyM@ballardspahr.com](mailto:KelleyM@ballardspahr.com)>  
**Subject:** RE: Initial Disclosures

**⚠ EXTERNAL**

Leita,

To expedite the process of exchange of documents – as the judge noted, discovery has been long stalled – please forward your proposed protective order as soon as possible.

Thank you,  
April



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**From:** Walker, Leita <[WalkerL@ballardspahr.com](mailto:WalkerL@ballardspahr.com)>  
**Sent:** Tuesday, June 15, 2021 11:31 AM  
**To:** April Barker <[abarker@sbe-law.com](mailto:abarker@sbe-law.com)>  
**Cc:** Kelley, Matthew E. <[KelleyM@ballardspahr.com](mailto:KelleyM@ballardspahr.com)>  
**Subject:** RE: Initial Disclosures

Hi, April, we'll produce non-privileged documents in response to properly served requests for production and after entry of a suitable protective order. We're not required to produce documents with initial disclosures.

When the time comes for production, I believe we provide them to you on disc, but I will double check on that.

Leita

**From:** April Barker <[abarker@sbe-law.com](mailto:abarker@sbe-law.com)>  
**Sent:** Tuesday, June 15, 2021 10:34 AM  
**To:** Walker, Leita (Minn) <[WalkerL@ballardspahr.com](mailto:WalkerL@ballardspahr.com)>  
**Subject:** Initial Disclosures

**⚠ EXTERNAL**

Hi Leita,

I hope that you are well.

I am following up on the email message that forwarded Netflix's initial disclosures. The disclosures reference certain non-privileged documents and materials as available for inspection.

What would be the simplest way of arranging for duplication of these materials so that I don't have to travel to view them?

Thank you,  
April

April Rockstead Barker | Attorney



**SCHOTT, BUBLITZ  
& ENGEL s.c.**

ATTORNEYS AT LAW  
640 W. Moreland Boulevard  
Waukesha, WI 53188  
☎ P: (262) 827-1700  
☎ F: (262) 827-1701  
✉ E: [abarker@sbe-law.com](mailto:abarker@sbe-law.com)  
Web: [www.sbe-law.com](http://www.sbe-law.com)

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